

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

MARC VEASEY, *et al.*,

Plaintiffs,

v.

GREG ABBOTT, *et al.*,

Defendants.

Civil Action No. 2:13-cv-193 (NGR)
(Consolidated Action)

**TEXAS NAACP AND MALC PLAINTIFFS' REVISED MOTION FOR AN AWARD OF
ATTORNEYS' FEES AND REIMBURSEMENT OF LITIGATION EXPENSES**

PLEASE TAKE NOTICE that pursuant to the Voting Rights Act, 52 U.S.C. § 10310(e), 42 U.S.C. § 1988, and this Court's October 9, 2018, February 19, 2019, and March 18, 2019 Orders [ECF Nos. 1129, 1134, 1138], attorneys on behalf of the Mexican American Legislative Caucus of the Texas House of Representatives ("MALC") and the Texas State Conference of NAACP Branches ("Texas NAACP") respectfully bring this Revised Motion for an award of \$2,433,587.34 in attorneys' fees and \$338,622.78 in expenses as detailed in the individual declarations of Ezra Rosenberg (Lawyers' Committee for Civil Rights Under Law), Neil Steiner (Dechert LLP), Myrna Pérez (Brennan Center for Justice), Jose Garza (MALC), Gary Bledsoe (Texas NAACP), and Robert Notzon (Texas NAACP).

Total Revised Fees Sought by Texas NAACP/MALC Plaintiff Group

Firm/Organization	Total Fees Sought
Dechert LLP	\$1,484,304.60
Lawyers' Committee for Civil Rights Under Law	\$583,962.19
Brennan Center for Justice	\$246,689.90
Texas NAACP	\$67,812.95
MALC	\$50,817.70
Totals	<u>\$2,433,587.34</u>

Total Revised Expenses Sought by Texas NAACP/MALC Plaintiff Group

Firm/Organization	Total Expenses Sought
Dechert LLP	\$267,418.95
Lawyers' Committee for Civil Rights Under Law	\$16,883.09
Brennan Center for Justice	\$51,405.95
TX NAACP	\$898.75
MALC	\$2,016.04
Totals	<u>\$338,622.78</u>

Additionally, MALC and Texas NAACP attorneys rely on the Memorandum of Law in Support of the Plaintiffs' Motion for Attorneys' Fees, filed on behalf of all Plaintiffs by the Veasey Plaintiffs, as well as the declaration submitted by Plaintiffs' expert William R. Edwards.

Date: July 15, 2019

Respectfully submitted,

/s/ Lindsey B. Cohan _____
 JON M. GREENBAUM
 EZRA D. ROSENBERG
 BRENDAN B. DOWNES
 Lawyers' Committee for
 Civil Rights Under Law
 1401 New York Avenue NW Suite 400
 Washington, D.C. 20005

WENDY WEISER
MYRNA PÉREZ
The Brennan Center for Justice at NYU Law School
120 Broadway, Suite 1750
New York, New York 10271

SIDNEY S. ROSDEITCHER
Paul, Weiss, Rifkind, Wharton & Garrison LLP
1285 Avenue of the Americas
New York, New York 10019-6064

LINDSEY B. COHAN
Dechert LLP
500 W. 6th Street, Suite 2010
Austin, Texas 78701

NEIL STEINER
DECHERT LLP
1095 Avenue of the Americas
New York, New York 10036-6797

JOSE GARZA
Law Office of Jose Garza
7414 Robin Rest Drive
San Antonio, Texas 98209

DANIEL GAVIN COVICH
Covich Law Firm LLC
802 N Carancahua, Ste 2100
Corpus Christi, Texas 78401

GARY BLEDSOE
Potter Bledsoe, LLP
316 W. 12th Street, Suite 307
Austin, Texas 78701

VICTOR GOODE
NAACP
4805 Mt. Hope Drive
Baltimore, Maryland 21215

ROBERT NOTZON
The Law Office of Robert Notzon
1502 West Avenue
Austin, Texas 78701

*Counsel for the Texas State Conference of NAACP
Branches and the Mexican American Legislative
Caucus of the Texas House of Representatives*

CERTIFICATE OF SERVICE

I hereby certify that on July 15, 2019 I electronically served the foregoing via ECF on all other parties in this litigation.

/s/ Lindsey Cohan

CERTIFICATE OF CONFERENCE

I have conferred with counsel for Defendants, Mr. Matthew Frederick, and have been informed that Defendants oppose this motion.

/s/ Ezra Rosenberg